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David J. Bradley, Clerk  
Laredo Division

\_AO91 (Rev. 8/01) Criminal Complaint

## United States District Court

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

Harold SANDERS Jr.

Detroit, Michigan -1

Case Number:

Terrance John JACKSON

Detroit, Michigan -2

5:14mj1505-1  
-2  
-3

Genaro DEL BOSQUE

Laredo, Texas -3

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about December 2, 2014 in Laredo, Texas Webb County, in

(Date)

the Southern District of Texas, Harold SANDERS Jr.,Terrance John JACKSON, and Genaro DEL BOSQUE defendant(s),

did unlawfully transport Mexican aliens Eric RUIZ-Morales, Javier RIOS-Servin, Jose PONCE-Ponce, and Alfredo RIOS-Servin along with twelve (12) other undocumented aliens from Mexico, Guatemala, and Venezuela by means of a motor vehicle within the Southern District of Texas, knowing or in reckless disregard of the fact that said undocumented aliens had come to, entered, or remained in the United States in violation of law, and transported or moved said undocumented aliens within the United States by means of motor vehicle or otherwise, in furtherance of such violation of law.

in violation of Title 8 United States Code, Section(s) 1324 (a) (1) (A) (ii)

Special Agent,


I further state that I am a(n) Homeland Security Investigations and that this complaint is based on the

Official Title

following facts: based on statements of the accused and records of the Immigration &amp; Naturalization Service.

See Attachment "A"

Continued on the attached sheet and made a part of this complaint:

☒ Yes☐ No
  
Signature of Complainant

Roy Huron

Printed Name of Complainant

Sworn to before me and signed in my presence,

December 4, 2014

Date

at

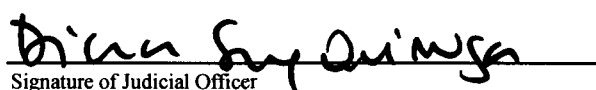
Laredo, Texas

City and State

Honorable Diana Song Quiroga

U.S. Magistrate Judge

Name and Title of Judicial Officer

  
Signature of Judicial Officer

United States of America

Page 2

vs

**Harold SANDERS Jr**  
**Terrance John JACKSON**  
**Genaro DEL BOSQUE**

[CONT OF BASIS OF COMPLAINT]

On December 2, 2014 at approximately 1:15pm, Homeland Security Investigation (HSI) Laredo, Special Agents (SA) were conducting surveillance in the Killiam Industrial area in Laredo, Texas. HSI SAs observed three (3) vehicles drop off approximately sixteen (16) subjects, and load them into two separate white Volvo semi-tractors. HSI SAs observed the driver of one the vehicles a white Ford Expedition, later identified as Genaro DEL BOSQUE (DOB: \_\_\_\_\_), follow the two tractors as they departed the area and traveled north on IH-35. The activity witnessed by HSI SAs is commonly perceived as alien smuggling activity. HSI SAs continued surveillance and followed the tractor to the Interstate 35 U.S. Border Patrol (USBP) Checkpoint. DEL BOSQUE was subsequently detained by HSI SAs.

At approximately 1:50pm, HSI SAs contacted Border Patrol Agents (BPAs) assigned to the USBP checkpoint located on I-35 north of Laredo, Texas and notified them of the alien smuggling activity witnessed in the Killiam Industrial area. HSI SAs requested a secondary inspection of the two tractors. While the BPA was conducting an immigration inspection of the drivers, later identified as Terrance John JACKSON (DOB: \_\_\_\_\_) and Harold SANDERS Jr. (DOB: \_\_\_\_\_), a BPA K-9 handler assigned to the same commercial lane notified the primary BPA that his service K-9 alerted to the presence of contraband or concealed humans within both JACKSON's and SANDERS' semi-tractors. Both JACKSON and SANDERS were instructed to drive their tractors to the secondary area for further inspection.

At secondary inspection, eight (8) individuals were within the sleeper compartment of JACKSON's tractor and additional eight (8) individuals were found within the sleeper compartment of SANDER's tractor. BPAs conducted immigration inspections on the sixteen (16) occupants of both vehicles, and it was determined that all sixteen (16) had entered the United States illegally by wading across the Rio Grande River without being inspected and had no legal right to remain in the United States. Fourteen (14) of the subjects were citizens of Mexico one (1) from Guatemala and one (1) from Venezuela. HSI SAs conducted interviews of all subjects involved.

At approximately 3:00pm, HSI SAs read DEL BOSQUE his Miranda Rights to which he freely waived and agreed to speak with HSI SAs. Del BOSQUE stated he was recruited to transport the undocumented aliens (UDAs) for financial gain. DEL BOSQUE stated he was paid seventy-five dollars (\$75.00 USDs) per UDA. DEL BOSQUE also stated he was instructed to follow the semi-tractors towards the US Border Patrol Checkpoint to insure they arrived there. DEL BOSQUE stated he transported and dropped off UDAs to the same two tractors twice in the same day. DEL BOSQUE stated in the morning he transported five (5) UDAs in the first load and an additional five (5) in the afternoon load for a total of ten (10) UDAs.

At approximately 3:00pm, HSI agents read SANDERS his Miranda Rights. SANDERS refused to answer any questions pertaining to the event and stated he was only going to own up for his actions. Subsequently, the interview with SANDERS was terminated.

At approximately 3:30pm, HSI agents read JACKSON his Miranda Rights. JACKSON also refused to answer any questions pertaining to the event and stated he was not going to give any information about today's events. Subsequently, the interview with JACKSON was terminated.

HSI SAs interviewed the sixteen (16) adult UDAs and each stated that they were transported from various stash houses and by various individuals to awaiting tractor trailers, noting that the tractors had been purposely left turned on with the engine running. The UDAs stated that once they were positioned in the sleeper compartments of the tractors the curtain was closed and a few minutes later the truck began to move, and did not stop until reaching the US Border Patrol Checkpoint.

JACKSON, SANDERS, and DEL BOSQUE were arrested and charged with 8 USC 1324, Transporting Undocumented Aliens. Eric RUIZ-Morales, Javier RIOS-Servin, Jose PONCE-Ponce, and Alfredo RIOS-Servin were held as material witnesses.